

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

WILLIAM FRINTZILAS and  
ANGELO POZZUTO,

**NOTICE OF MOTION**

Plaintiffs,

Case No.: 7:17-cv-2368-VB

v.

DIRECTV, LLC and  
MASTEC NORTH AMERICA, INC.,  
*erroneously named as MASTEC, INC.*

Defendants.

---

**MOTION MADE BY:**

Defendant MasTec North America, Inc. by and  
through its attorneys, Goldberg Segalla LLP

**DATE, TIME AND PLACE OF HEARING:** To be determined by Order of the Court

**SUPPORTING PAPERS:** Declaration of Daniel B. Moar, executed June  
23, 2017; and Memorandum of Law.

**RELIEF DEMANDED:**

- a) Dismissal of Complaint pursuant to  
Federal Rules of Civil Procedure  
12(b)(6).
- b) For such other and further relief the  
Court may deem just and proper.

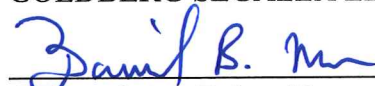
**REPLY PAPERS:**

Defendants intend to submit reply papers.

**ORAL ARGUMENT IS REQUESTED**

Dated: Buffalo, New York  
June 23, 2017

GOLDBERG SEGALLA LLP



Christopher J. Belter, Esq.

Daniel B. Moar, Esq.

Oliver E. Twaddell

*Attorneys for Defendant*

*MasTec North America, Inc.,*

*erroneously named as MasTec, Inc.*

665 Main Street, Suite 200  
Buffalo, New York 14203  
Phone: 716.566.5400  
Fax: 716.566.5401  
cbelter@goldbergsegalla.com  
dmoar@goldbergsegalla.com

711 3rd Avenue, Suite 1900  
New York, New York 10017-4013  
Phone: 646.292.8751  
Fax: 646.292.8701  
otwaddell@goldbergsegalla.com